RETURN DATE: MAY 16, 2023 : SUPERIOR COURT

JOHN WELDON : J.D. OF FAIRFIELD

V. : AT BRIDGEPORT

JOSEPH SOKOLOVIC : APRIL 11, 2023

COMPLAINT

FIRST COUNT

- The Plaintiff formerly was the Chairman of the City of Bridgeport Board of Education.
- On or about November 15, 2022, the Plaintiff resigned as the Chairman of the City of Bridgeport Board of Education.
- 3) Since the Plaintiff's resignation as Chairman of the City of Bridgeport Board of Education, the Defendant has caused to be published documents in which he wrongfully accused the Plaintiff of resigning "in disgrace" and accused the Plaintiff of "ineptitude."
- 4) Said publications were false and malicious.
- 5) Said publications being read by others have caused the Plaintiff to be held up to public ridicule and humiliation; and has caused him great annoyance,

- embarrassment, and shame; whereby he has suffered severe loss and his good name and character have been greatly injured.
- 6) As a result thereof, the Plaintiff has suffered extreme humiliation, mental anxiety and emotional distress and has been required to assume various incidental expenses.

SECOND COUNT

- 1-2) Paragraphs 1 through 2 of the First Count are incorporated herein and made paragraphs 1 through 2 of this the Second Count.
- 3) Since the Plaintiff's resignation as Chairman of the City of Bridgeport
 Board of Education the Defendant has stated in the hearing of diverse persons
 that the Plaintiff resigned "in disgrace" and further accused the Plaintiff of
 "Ineptitude" for his work as Chairman of the City of Bridgeport Board of
 Education.
- 4) Said words were false and malicious.
- 5) In consequence of said words it has caused the Plaintiff to be held up to public ridicule and humiliation; and has caused him great annoyance, embarrassment and shame; whereby he has suffered severe loss and his good name and character have been greatly injured.

6) As a result thereof, the Plaintiff has suffered extreme humiliation, mental anxiety and emotional distress and has been required to assume various incidental expenses.

THIRD COUNT

- 1-2) Paragraphs 1-2 of the First Count are incorporated herein and made Paragraphs 1-2 of this the Third Count.
- 3) Since the Plaintiff resigned as Chairman of the City of Bridgeport Board of education the Defendant has made representations, statements and caused to be published documents in which he has wrongfully accused the Plaintiff of resigning in "disgrace" and accused the Plaintiff of "ineptitude."
- 4) Accusing the Plaintiff of having resigned in "disgrace" and accusing the Plaintiff of "ineptitude" would be highly offensive to a reasonable person, and such statements and representations made by the Defendant were wrongful and malicious.
- 5) Defendants knew or acted in reckless disregard as to the falsity of the accusations made against the plaintiff and the false light in which the plaintiff would be placed.
- 6) Being placed in such false light was highly offensive to plaintiff.

- 7) The Plaintiff's reputation furthermore has and will be damaged as a direct and proximate result of such invasion of privacy by false light.
- 8) As a result of the foregoing the Plaintiff has sustained damages including damage to his reputation and character, embarrassment and shame, loss of good name and character, and mental and emotional distress and anguish.

WHEREFORE THE PLAINTIFF CLAIMS:

- 1) Monetary damages;
- 2) Such other and further relief as in law and equity may pertain.

THE PLAINTIFF

BY:

JOHN T. BOCHANIS DALY, WEIHING & BOCHANIS, LLC 1776 North Avenue Bridgeport, CT 06604

(203) 333-8500

Juris No. 101227

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STATEMENT RE: AMOUNT IN DEMAND

The amount of legal interest or property in demand is not less than FIFTEEN THOUSAND (\$15,000.00) DOLLARS, exclusive of interest and costs.

THE PLAINTIFF

BY:

JOHN T. BOCHANIS

DALY, WEIHING & BOCHANIS, LLC

1776 North Avenue Bridgeport, CT 06604

(203) 333-8500 Juris No. 101227